

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

VICTOR MANUEL RIBAS,)
Plaintiff,)
v.) Case No. 4:24-cv-00632
MEGAN BESLER,)
Defendant.)

MOTION FOR LEAVE TO FILE UNDER SEAL

COMES NOW Defendant Megan Besler (hereinafter “Defendant” or “Besler”), by and through her counsel of record, and respectfully requests that this Court enter an Order authorizing the filing of Defendant’s Motion for Miscellaneous Relief and/or Sanctions, and any related attachments or exhibits, under seal.

1. In this matter, both parties have designated as confidential a Memorandum of Understanding related to the mediation in this matter which took place on December 11, 2024.

2. Defendant’s Motion for Miscellaneous Relief and/or Sanctions largely discusses this confidential Memorandum of Understanding, though there are some portions that do not. The non-confidential portions of Defendant’s Motion will not be redacted in the public filing should this Motion for Leave to File Under Seal be granted.

3. Defendant believes filing the necessary documents under seal will not result in prejudice to any party. In accordance with Amended Local Rule 13.05, Defendant therefore moves the Court to enter an Order authorizing same.

Dated: September 15, 2025

Respectfully submitted,

KEANE LAW LLC

By: /s/ Ryan A. Keane
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CERTIFICATE OF SERVICE

I hereby certify that on September 15, 2025, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to the attorneys of record.

/s/ *Ryan A. Keane*